

EXHIBIT A

LORD, KOBRIN, ALVAREZ & FATTELL, LLC
ROBERT A. LORD, ESQ. Atty I.D. 03155-1986
1283 ROUTE 22 EAST
MOUNTAINSIDE, NJ 07092
(908)232-7666
Attorney(s) for Plaintiff

JAMES HUNTER,
Plaintiff(s)

vs.

DOLLAR GENERAL, JOHN DOES 1-5, ABC
CORPS. 1-5 (said names being fictitious)

Defendant(s),

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: ESSEX COUNTY
DOCKET NO.: ESX-L-5886-21

CIVIL ACTION

SUMMONS

From The State of New Jersey To The Defendant(s) Named Above: DOLLAR GENERAL

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$175.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.

/s/ Michelle M. Smith, Esq.

Michelle M. Smith, Esq., Clerk of Superior Ct.

DATED: January 17, 2022

Name of Defendant to Be Served: **DOLLAR GENERAL**

Address of Defendant to Be Served: **CSC 2908 POSTON AVE, NASHVILLE, TN 37203.**

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COMPLAINT, DESIGNATION OF TRIAL
ATTORNEY, STATEMENT FOR
DAMAGES AND JURY DEMAND

Plaintiff, James Hunter residing at 216-218 South 8th Street in the of Newark, Country of Essex and State of New Jersey, by way of Complaint against the defendants says:

FIRST COUNT

1. On or about 15th of August 2019, plaintiff, James Hunter was lawfully on the premises of defendant, Dollar General located at 215 W. Front Street in the City of Plainfield, County of Union and State of New Jersey.
2. At said time and place, plaintiff, James Hunter was on defendant's premises at which time slipped and fell causing him to sustain personal injuries.
3. Defendant, Dollar General, their agents, servants and employees were careless and negligent in keeping the premises properly maintained.
4. The defendants were negligent in that they:
 - a. Did not keep the premises in a safe condition;
 - b. Did not exercise proper care;
 - c. Caused a dangerous and hazardous condition to exist;
 - d. Allowed a nuisance to exist; and

e. Failed to provide proper safeguards and/or warnings.

5. Plaintiff, James Hunter was caused to suffer and sustain severe and disabling bodily injuries which she has been and will in the future be caused to obtain medical treatment, and has been and will in the future be caused to lose time from employment, and has been and will in the future be caused to refrain from normal pursuits.

WHEREFORE, plaintiff, James Hunter demands judgment against defendant, jointly, severally or in the alternative for damages, interest, and costs of suit.

SECOND COUNT

1. Plaintiff repeats each and every allegation of the prior count of the Complaint and incorporates the same as if set forth fully herein.

2. The defendant(s), John Does 1-5, ABC Corps. 1-5 are fictitious names intended to identify any and all parties, including individuals, corporations and/or other entities whose identities are presently unknown to the plaintiff, who together with the named defendants are responsible for the ownership, operation, control and maintenance of the defendant(s) referred to herein, or who in any way caused or contributed to plaintiff's injuries.

3. As a direct and proximate result of the negligence of the defendants aforesaid, plaintiff suffered serious physical and emotional injuries of both a temporary and permanent nature, considerable pain, anguish and suffering, shock, loss of wages and other special damages.

WHEREFORE, plaintiff, James Hunter demands judgment jointly, severally or in the alternative against all defendants on this Count for damages, interest and costs of suit.

DESIGNATION OF TRIAL COUNSEL

Plaintiff designates Robert A. Lord, Esq. as Trial Counsel pursuant to Rule 4:25-4.

DEMAND FOR INTERROGATORIES

Plaintiff hereby demands answers to Uniform Interrogatories Form C and C-1.

JURY DEMAND

Plaintiff demands trial by jury on all counts in this Complaint.

LORD, KOBRIN, ALVAREZ & FATTELL, LLC
Attorneys for Plaintiff(s)

/s/ ROBERT A. LORD

BY:

ROBERT A. LORD

Dated: July 29, 2021

CERTIFICATION OF COUNSEL

Pursuant to Rule 4:5-1 the undersigned hereby certifies that at the time of filing this Complaint, the matter in controversy is not the subject of any other action pending in any Court and/or Arbitration proceeding.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

LORD, KOBRIN, ALVAREZ & FATTELL, LLC
Attorneys for Plaintiff(s)

/s/ ROBERT A. LORD

BY:

ROBERT A. LORD

Dated: July 29, 2021

DEMAND FOR PRODUCTION OF DOCUMENTS

Pursuant to R.4:18-1, the Plaintiffs hereby demand that the Defendant produce the following documentation within thirty (30) days as prescribed by Rules of Court. Additionally, please be advised that the following requested are continuing and ongoing in nature and the Defendant is therefore required to continuously update its response thereto as new information or documentation.

1. **The amounts of any and all insurance coverage covering the Defendant, including but not limited to, primary insurance policies, secondary insurance policies and/or umbrella insurance policies. For each such policy of insurance, supply a copy of the declaration page there from.**

2. Copies of any and all documentation or reports, including but not limited to, police reports, accident reports and/or incident reports concerning the happening of the incident in question or any subsequent investigation of same.

3. Copies of any and all photographs, motion pictures, videotapes, films, drawings, diagrams, sketches or other reproductions, descriptions, or accounts concerning the individuals involved in the incident in question, the property damage sustained, the accident scene of anything else relevant to the incident in question.

4. Copies of any and all signed or unsigned statements, documents, communications, and/or transmissions, whether in writing, made orally or otherwise recorded by any mechanical or electronic means, made by any party to this action, any witness, or any other individual, businesses, corporation, investigative authority or other entity concerning anything relevant to the incident in question.

5. Copies of any and all documentation, including but not limited to, and contracts between the owner of the property or product involved in the incident in question and any of the parties involved.

6. Copies of any and all contracts between any of the parties involved in the incident in question.

7. Copies of any and all documentation concerning any lease agreements between the lessor(s) and the lessee(s) concerning the incident in question.

8. Copies of any and all documentation, including but not limited to, safety manuals, statutes, rules, regulation, books and/or industry standards which refer to, reflect or otherwise relate to the incident in question or any potential defense to the action in question.

9. Copies of any and all permits applied for by the parties to the action in question concerning either the product in question, the accident scene, or anything else relevant to the happening of the accident in question.

10. Copies of any and all permits received by the parties to the action in question concerning either the product in question, the accident scene, or anything else relevant to the happening of the accident in question.

11. Copies of any and all discovery received from any other parties to the action in question.

12. Copies of any and all reports of the Plaintiffs received by the Defendants, or any other party to this suit, from either the Central Index Bureau (C.I.B.) or from any other source.

13. Copies of any and all reports and/or other investigations performed by O.S.H.A. or any other investigative authority.

14. Copies of any and all medical information and/or documentation concerning the Plaintiffs in this matter whether it concerns any medical condition or treatment which took place before, during or after the time of the incident in question.

15. Copies of any and all records of any type subpoenaed by the Defendant or received from any other source concerning the Plaintiffs or the incident in question.

16. A list of employees present at the job site or accident site their names, addresses and job titles.

17. The reports of any and all medical experts who have reviewed and/or performed any examination in regard to any aspect of this case on behalf of Defendant or Defendant's attorney and who have submitted either oral or written report to Defendant or Defendant's attorney. In the event that a report was oral provide a complete summary of said report.

18. If any motor vehicle violations/summons or any other summons or complaint was issued in connection with this accident or incident, provide copies of any Municipal Court plea dispositions or transcripts relating thereto.

19. Copies of any and all drawings or diagrams of the accident scene.

20. Complete and legible copies of all complaints (lawsuits) filed against these Defendants within five years prior to the incident which gives rise to this action, which complaints alleged negligent maintenance of this Defendant's premises.

Please be advised that Plaintiffs hereby object to the taking of any photographs, x-rays, or other reproductions concerning the Plaintiffs or the Plaintiffs' injuries at the time of the defense examination.

BY: /s/ ROBERT A. LORD
ROBERT A. LORD

Dated: July 29, 2021

Civil Case Information Statement

Case Details: ESSEX | Civil Part Docket# L-005886-21

Case Caption: HUNTER JAMES VS DOLLAR GENERAL

Case Initiation Date: 07/29/2021

Attorney Name: ROBERT A LORD

Firm Name: LORD, KOBRIN, ALVAREZ & FATTELL

Address: 1283 ROUTE 22 EAST

MOUNTAINSIDE NJ 07092

Phone: 9082327666

Name of Party: PLAINTIFF : hunter, james

Name of Defendant's Primary Insurance Company

(if known): None

Case Type: PERSONAL INJURY

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

Are sexual abuse claims alleged by: james hunter? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO Title 59? NO Consumer Fraud? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b)

07/29/2021

Dated

/s/ ROBERT A LORD

Signed

ATLANTIC COUNTY:

Deputy Clerk of the Superior Court
Civil Division, Direct Filing
1201 Bacharach Blvd., First Floor
Atlantic City, NJ 08401
LAWYER REFERRAL
(609) 345-3444
LEGAL SERVICES
(609) 348-4200

BERGEN COUNTY:

Deputy Clerk of the Superior Court
Civil Division, Room 115
Justice Center, 10 Main St.
Hackensack, NJ 07601
LAWYER REFERRAL
(201) 488-0044
LEGAL SERVICES
(201) 487-2166

BURLINGTON COUNTY:

Deputy Clerk of the Superior Court
Central Processing Office
Attn: Judicial Intake
First Fl., Courts Facility
49 Rancocas Rd.
Mt. Holly, NJ 08060
LAWYER REFERRAL
(609) 261-4862
LEGAL SERVICES
(800) 496-4570

CAMDEN COUNTY

Deputy Clerk of the Superior Court
Civil Processing Office
Hall of Justice
1st Fl., Suite 150
101 S. Fifth St.
Camden, NJ 08103
LAWYER REFERRAL
(856) 964-4520
LEGAL SERVICES
(856) 964-2010

CAPE MAY COUNTY:

Deputy Clerk of the Superior Court
9 N. Main Street
Cape May Court House, NJ 08210
LAWYER REFERRAL
(609) 463-0313
LEGAL SERVICES
(609) 465-3001

CUMBERLAND COUNTY:

Deputy Clerk of the Superior Court
Civil Case Management Office
60 West Broad St.
P.O. Box 10
Bridgeton, NJ 08302
LAWYER REFERRAL
(856) 696-5550
LEGAL SERVICES
(856) 691-0494

ESSEX COUNTY:

Deputy Clerk of the Superior Court
Civil Customer Service
Hall of Records, Room 201
465 Dr. Martin Luther King, Jr. Blvd.
Newark, NJ 07102
LAWYER REFERRAL
(856) 482-0618
LEGAL SERVICES
(973) 624-4500

GLOUCESTER COUNTY:

Deputy Clerk of the Superior Court
Civil Case Management Office
Attn: Intake
First Fl., Court House
1 North Broad St.
Woodbury, NJ 08096
LAWYER REFERRAL
(856) 848-4589
LEGAL SERVICES
(856) 848-5360

HUDSON COUNTY:

Deputy Clerk of the Superior Court
Superior Court, Civil Records Dept.
Brennan Court House - 1st Floor
583 Newark Ave.
Jersey City, NJ 07306
LAWYER REFERRAL
(201) 798-2727
LEGAL SERVICES
(201) 792-6363

HUNTERDON COUNTY:

Deputy Clerk of the Superior Court
Civil Division
65 Park Avenue
Flemington, NJ 08822
LAWYER REFERRAL
(908) 735-2611
LEGAL SERVICES
(908) 782-7979

MERCER COUNTY:

Deputy Clerk Superior Court
Local Filing Office, Courthouse
175 South Broad Street, P.O. Box 8068
Trenton, NJ 08650
LAWYER REFERRAL
(609) 585-6200
LEGAL SERVICES
(609) 695-6249

MIDDLESEX COUNTY:

Deputy Clerk of the Superior Court
Middlesex Vicinage
2nd Floor - Tower
56 Paterson St., P.O. Box 2633
New Brunswick, NJ 08903-2633
LAWYER REFERRAL
(732) 828-0053
LEGAL SERVICES

(732) 249-7600

MONMOUTH COUNTY:

Deputy Clerk of the Superior Court
Court House
P.O. Box 1269
Freehold, NJ 07728-1269
LAWYER REFERRAL
(732) 431-5544
LEGAL SERVICES
(732) 866-0020

MORRIS COUNTY:

Deputy Clerk of the Superior Court
Morris County Courthouse
Civil Division
Washington and Court Sts.
P.O. Box 910
Morristown, NJ 07960-0910
LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(973) 285-6911

OCEAN COUNTY:

Deputy Clerk of the Superior Court
118 Washington Street, Room 121
P.O. Box 2191
Toms River, NJ 08754-2191
LAWYER REFERRAL
(732) 240-3666
LEGAL SERVICES
(732) 341-2727

PASSAIC COUNTY:

Deputy Clerk of the Superior Court
Civil Division
Court House
77 Hamilton Street
Paterson, NJ 07505
LAWYER REFERRAL
(973) 278-9223
LEGAL SERVICES
(973) 523-2900

SALEM COUNTY:

Deputy Clerk of the Superior Court
Attn: Civil Case Management Office
92 Market St.
Salem, NJ 08079
LAWYER REFERRAL
(856) 678-8363
LEGAL SERVICES
(856) 451-0003

SOMERSET COUNTY:

Deputy Clerk of the Superior Court
Civil Division
P.O. Box 3000
40 North Bridge St.
Somerville, NJ 08876
LAWYER REFERRAL
(908) 685-2323
LEGAL SERVICES

(908) 231-0840

SUSSEX COUNTY:

Deputy Clerk of the Superior Court
Sussex County Judicial Center
43-47 High Street
Newton, NJ 07860
LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(973) 383-7400

UNION COUNTY:

Deputy Clerk of the Superior Court
1st Fl., Court House
2 Broad Street
Elizabeth, NJ 07207-6073
LAWYER REFERRAL
(908) 353-4715
LEGAL SERVICES
(908) 354-4340

WARREN COUNTY:

Deputy Clerk of the Superior Court
Civil Division Office
Court House
413 Second St.
Belvidere, NJ 07823-1500
LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(908) 475-2010